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9/16/2010

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: TV White Spaces
ET Docket Nos. 04-186 and 02-380

Dear Ms. Dortch:

Our company, Certified Installation Associates LLC, currently provides fixed wireless broadband service in Hammonton/Elwood (08037 & 08217) and Little Egg Harbor (08087) in southern rural New Jersey. We also provide Wi-Fi service in portions of the Mullica River, Little Egg Bay and Great Egg Bay. This area is the rural intersection of 3 NJ counties; Atlantic, Ocean and Burlington. We are investigating building a network in Pamlico County North Carolina where there is limited to no broadband service other than limited Verizon EVDO CDMA service or cost prohibitive satellite providers.

We operate wireless broadband services for consumers who are demographically underserved or can not afford traditional broadband data or VOIP (SIP) services available from traditional wireless or wired broadband providers. We rely solely on unlicensed spectrum to operate these networks. These greenfield networks use devices authorized under FCC Part 15 rules adopted to open up 900 MHz, 2.4 GHz and 5 GHz spectrum for unlicensed broadband devices. Thanks to the Commission's initiatives, consumers in the areas we serve now have access to a low cost, high quality alternative broadband service.

Our company provides consulting services for the major wireless carriers. Wireless carriers have begun to deploy unlicensed 802.11A/B/G/N services to off load network traffic. Most current wireless 3/4G Smartphone platforms have 802.11x capable chipsets. These users would also benefit if the UHF band could be used to backhaul 802.11B/G networks/access points.

Certified Installation Associates LLC is very interested in utilizing television white spaces so that we can expand and improve service to this consumer base. Our current territory is based in and around the NJ Pinelands National Reserve. The pineland foliage presents a unique and challenging environment for radio frequency propagation. The present FCC Part 15 bands experience substantial attenuation in this environment. Additionally, tower/transmitter construction is difficult if not impossible due to local environmental regulations. The lower UHF frequencies would allow us to grow our footprint and reduce the cost of entering into additional

tower leases. We are involved in the initial phases of designing a network in Mullica and Washington Townships (NJ) to provide parents of students with a no to low cost alternative to traditional cable modems (where cable broadband is existing). This initiative could provide parents an affordable alternative broadband service option. The lower white space frequencies could also be used for the backhaul and to cover areas not currently serviced by DSL, Cable Modem or Wireless 3G/4G networks. We are committed to deploying as soon as equipment for point-to-multipoint service is type accepted and commercially available.

I am pleased that the FCC will be acting on TV white space petitions for reconsideration in the near future. There are several proposals that would help us to deploy cost and spectrum efficient service.

First, the FCC should allow WISPs to operate using base station antennas mounted higher than 30 meters, and operators should be allowed to install customer antennas (CPE) at heights below 10 meters. If we could increase our base station antenna height to 100 meters, we could cover up to three times more area with a base station and reduce our equipment, tower acquisition and tower lease fees by a substantial amount – an amount that could be the difference between deploying and not deploying in an area. We support the WISPA and Motorola proposals to increase base station height. By removing any minimum CPE height restrictions, we would not have to put tall masts on residences and would be able to provide service at a lower cost. While I make this recommendation if the commission was to stay with the proposed limits I still believe the additional lower frequency spectrum would provide tremendous opportunities to extend our current coverage.

Second, we believe we should be allowed to operate with power in excess of 4 Watts EIRP in rural areas. As is the case with tower height, operating with higher power will give us a greater coverage area and reduce capital expense on infrastructure. An increase of 5db over the current levels could almost double our coverage footprint.

Third, we are very concerned about a proposal made by FiberTower and others to license white space spectrum for point-to-point wireless backhaul. Not only would adopting this proposal take six channels (36 MHz) and perhaps more channels away from WISP operators, but WISP's would have to protect these licensed links. Moreover, channels and areas far beyond the links would be blocked because the signals from the licensed links would overshoot the path and the endpoints. This is due to the low-cost, low-gain antennas FiberTower wants to use. We also would not deploy if a licensed point-to-point user could come along later and put us out of business with a licensed link. We support the views expressed by WISPA in their September 8 letter and ask the FCC to reject the FiberTower proposal.

To summarize I implore the Commission give the issue serious consideration when making their decision. The use of UHF White Spaces could have a dramatic affect on the ability of our company to deliver a reliable and cost effective wireless broadband option to the homes of many underserved households.

Sincerely,

William Lentz/CTO
Certified Installation Associates LLC